



DISCUSSION PAPER

Topic: COOP and COG –
A Consolidated Approach



1.0 INTRODUCTION

The changing threat environment has shifted our awareness to the need for Continuity of Government (COG) and Continuity of Operations (COOP) capabilities that enable state and local governments to continue their essential functions across a broad spectrum of emergencies.

The overall purpose of both Continuity of Operations and Continuity of Government is to ensure the continuity of essential functions under all circumstances that may disrupt normal operations. As a baseline of preparedness for the full range of potential emergencies, all governments/agencies should have in place viable Continuity of Government and Continuity of Operations capabilities.

This discussion paper describes the concept of Continuity of Government, explains the federal concept of Continuity of Operations, and introduces the concept of a consolidated COOP/COG capability, referred to as COOP/COG for the purposes of this document. The goal is to develop a plan that clearly addresses elements of both COG and COOP, or to provide for the identification or addition of these elements into existing plans.

The principles and practices of COG are imbedded into existing California law and emergency plans. Existing plans that address COG may lack the new emphasis contained in COOP on ensuring operational capability of essential functions through tests, training, exercises, and interoperable communications. Incorporating both COG and COOP elements into plans and procedures can result in more integrated, comprehensive, and workable emergency plans.

2.0 CONTINUITY OF GOVERNMENT (COG)

Background

In anticipation of major catastrophic disasters, governmental units must be prepared to maintain operations throughout all types of destructive events including enemy attack by any method. Continuity of Government has been defined as the preservation, maintenance, or reconstitution of the civil government's ability to carry out its constitutional responsibilities.

It is essential to maintain the fabric of our constitutional form of government and to ensure that Californians have faith in their governments' capability to provide for their health, safety and welfare and to contribute to the common defense of the United States. Continuity of Government is concerned with the full range of governmental services including the three branches of government (judicial, legislative, and executive) and all levels of government (federal, state, and local).



State of California, Office of Emergency Services

Continuity of Operations and Continuity of Government - COOP/COG Guidance

Established in California Laws and Plans

Continuity of Government is addressed by a variety of State laws, plans, and in emergency and administrative procedures.

The Emergency Services Act, Section 8650, states: “Emergency plans means those official and approved documents, which describe the principles and methods to be applied in carrying out emergency operations or rendering mutual aid during emergencies. These plans include such elements as continuity of government, the emergency services of governmental agencies, mobilization of resources, mutual aid, and public information.”

In Executive Order W-9-91, numbers 4 and 5 respectively state: “The head of each department, bureau, board, commission and independent institution of state government, hereinafter referred to as an agency, is responsible for the emergency planning, preparedness, and training of his or her agency;” and “Each agency shall establish a line of succession which includes at least three persons for each position that is assigned essential emergency functions, for both headquarters and major field division, as defined by agency director. The agency plan shall define the conditions to be met to shift responsibility to the next successor...”

COG is critical to providing rapid and effective response to a truly catastrophic disaster and is identified as an element of the *California Emergency Plan* by the Emergency Services Act. (Gov. Code § 8560)

The *California State Emergency Plan* contains a brief description of the seven elements of COG that must be considered by all branches of government in California through development of appropriate emergency plans and related procedures.

3.0 CONTINUITY OF OPERATIONS (COOP)

Background

Continuity of Operations, similar to Continuity of Government, is a federal planning concept that focuses on government’s ability to continue essential functions. In order to ensure continuity of essential federal functions under all circumstances, all Federal agencies are directed to develop a Continuity of Operations capability.

COOP planning guidelines were provided to federal agencies via a number of Federal Preparedness Circulars (FPCs). In June 2004, the Department of Homeland Security’s Federal Emergency Management Agency (FEMA) updated the five-year old Federal Preparedness Circular #65, which supersedes previous FPCs on COOP planning. This new version expands continuity of operations planning to reflect new COOP procedures since 9/11.

COOP planning is simply a “good business practice”—part of the fundamental mission of agencies as responsible and reliable public institutions. For years, COOP planning activities have been an individual agency responsibility conducted primarily in response to the threat of emergencies within the confines of the organization.



The elements of a viable COOP capability are almost identical to the components of COG. COOP encompasses and enhances COG elements to establish a baseline of preparedness for the full range of potential emergencies.

4.0 CONSOLIDATION OF COG AND COOP

The state has relied on a variety of documents, such as departmental emergency operations plans, business continuity or business resumption plans, to accomplish many of the same planning objectives as those of COG and COOP. To maintain consistency among federal, state, and local plans, this document recommends that all levels of California government develop an integrated COOP/COG capability, which is a consolidation of all the planning elements included in COG and COOP (see table below for list of elements). This involves ensuring that all the elements of continuity of operations and continuity of government have been addressed and/or are incorporated in agency emergency plans and procedures. This effort would support coordinated planning at all governmental levels, thereby providing for a more effective emergency response.

Development of a COOP/COG capability can be useful in updating emergency plans and procedures. The COOP/COG concepts that have been summarized below are consistent with the federal guidance for all levels of government in updating or developing their plans.

<i>Consolidated Elements of Continuity of Operations/Continuity of Government</i>	
1.	Emergency concepts, actions and procedures provided in emergency plans and emergency action plans.
2.	Identification and prioritization of essential functions.
3.	Line of succession to essential positions required in an emergency.
4.	Delegation of authority and pre-delegation of emergency authorities to key officials.
5.	Emergency operations centers, alternate (work-site) facilities and alternate emergency operations centers.
6.	Interoperable communications.
7.	Protection of government resources, facilities and personnel.
8.	Safeguarding of vital records and databases.
9.	Tests, training and exercises.
10.	Devolution of control and direction.
11.	Reconstitution operations.



5.0 CONSOLIDATION OF COG AND COOP

Objectives

COG/COOP planning is an effort to assure that the capability exists to continue essential agency functions throughout any potential emergency. The objectives of COOP/COG include:

- Ensuring the continuous performance of an agency or department's essential functions/operations during an emergency;
- Protecting essential facilities, equipment, records, and other assets;
- Reducing or mitigating disruptions to operations;
- Reducing loss of life, minimizing damage and losses; and,
- Achieving a timely and orderly recovery from an emergency and resumption of full service to customers.

Planning Considerations

In accordance with federal guidance, COOP/COG:

- Must be maintained at a high level of readiness;
- Must be capable of implementation, both with and without warning;
- Must be operational no later than 12 hours after activation;
- Must maintain sustained operations for up to 30 days; and,
- Should take maximum advantage of existing agency field infrastructures.

Planning Approaches

There are several possible approaches to addressing both COOP and COG. They include:

1. Developing a separate plan, using the COOP/COG template, to address the eleven elements of COOP/COG and incorporating it into the EOP as an annex or by reference.
2. Updating existing business continuity plans and business resumption plans to address COOP/COG elements and incorporate those documents by reference into the emergency operations plan (EOP).
3. Consolidating documents containing the required elements by reference into an organization's emergency operations plan.